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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

KARL D. LUTES

Criminal No. 21-418  
(18 U.S.C. §§ 2252(a)(4)(B) and 2252(b)(2))  
[UNDER SEAL]

**INDICTMENT**

**COUNT ONE**

The grand jury charges:

On or about February 11, 2020, in the Western District of Pennsylvania, the defendant, KARL D. LUTES, did knowingly possess visual depictions, namely videos and still images in computer graphics and digital files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, and some of which depicted prepubescent minors and minors who had not attained 12 years of age engaging in such conduct, all of which had been shipped and transported in interstate and foreign commerce, by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

**FILED**

SEP 28 2021

CLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

**FORFEITURE ALLEGATIONS**

1. The allegations contained in Count One of this Indictment are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).

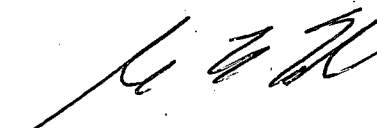
2. As a result of the knowing commission of the violation charged in Count One of this Indictment, the defendant, KARL D. LUTES, did use the following to commit or to promote the commission of said violation (hereinafter referred to as the "Subject Property"):

- a. One HP Laptop Computer, Serial Number CND55019MK;
- b. One Onn 32 GB Flash Drive (seized on February 11, 2020); and
- c. One iPhone 11, Serial Number DNPZD9EGN72J.

WHEREFORE, the government seeks Forfeiture of the Subject Property pursuant to Title 18, United States Code, Section 2253(a)(3).

A True Bill,

  
FOREPERSON

  
STEPHEN R. KAUFMAN  
Acting United States Attorney  
PA ID No. 42108